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Attorneys for Defendants, Counterclaimants, and
Third Party Plaintiffs PCJV USA, LLC, PCI
TRADING LLC, POTATO CORNER, LA
GROUP, LLC, GK CAPITAL GROUP, LLC,
NKM CAPITAL GROUP, LLC and GUY
KOREN, and Defendants J & K AMERICANA,
LLC, J&K LAKEWOOD, LLC, J&K
OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J
& K ONTARIO, LLC, J&K PC TRUCKS, LLC,
HLK MILPITAS, LLC, and GK CERRITOS, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SHAKEY'S PIZZA ASIA VENTURES,
INC, a Philippines corporation,

Plaintiff,

vs.

PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING , LLC, a
Delaware limited liability company; GUY
KOREN, an individual; POTATO CORNER
LA GROUP, LLC, a California limited
liability company; NKM CAPITAL GROUP,
LLC, a California limited liability company;
J & K AMERICANA, LLC, a California
limited liability company; J&K
LAKEWOOD, LLC, a California limited
liability company; J&K VALLEY FAIR,
LLC, a California limited liability company;
J & K ONTARIO, LLC, a California limited
liability company; HLK MILPITAS, LLC, a
California, limited liability company; GK
CERRITOS, LLC, a California, limited
liability company; J&K PC TRUCKS, LLC,
a California limited liability company; and,

Case No. 2:24-CV-04546-SB(AGRx)

Hon. Stanley Blumenfeld, Jr.

**JOINT REPORT IN RESPONSE
TO COURT ORDER, DKT. NO.
208**

Complaint Filed: May 31, 2024
Trial Date: August 18, 2025

1 GK CAPITAL GROUP, LLC, a California
2 limited liability company and DOES 1
3 through 100, inclusive,
4 Defendants.

5 PCJV USA, LLC, a Delaware limited
6 liability company; PCI TRADING LLC, a
7 Delaware limited liability company;
8 POTATO CORNER LA GROUP LLC, a
9 California limited liability company; GK
10 CAPITAL GROUP, LLC, a California
11 limited liability company; NKM CAPITAL
12 GROUP LLC, a California limited liability
13 company; and GUY KOREN, an individual,

14 Counter-Claimants,

15 v.

16 SHAKEY'S PIZZA ASIA VENTURES,
17 INC, a Philippines corporation,

18 Counter Defendant.

19 PCJV USA, LLC, a Delaware limited
20 liability company; PCI TRADING LLC, a
21 Delaware limited liability company;
22 POTATO CORNER LA GROUP LLC, a
23 California limited liability company; GK
24 CAPITAL GROUP, LLC, a California
25 limited liability company; NKM CAPITAL
26 GROUP LLC, a California limited liability
27 company; and GUY KOREN, an individual,

28 Third Party Plaintiffs,

v.

PC INTERNATIONAL PTE LTD., a
Singapore business entity; SPAVI
INTERNATIONAL USA, INC., a California
corporation; CINCO CORPORATION, a
Philippines corporation; and ROES 1 through
10, inclusive,

Third Party Defendants.

JOINT REPORT IN RESPONSE TO COURT ORDER, DKT. NO. 208

On Thursday, July 3, 2025, counsel for the parties, Michael D. Murphy, Matthew Follett, Todd Malynn, Arash Beral, and Jamison Gilmore, conferred via videoconference. The PCJV USA Parties reported that they oppose further delay, oppose the recommended relief (*i.e.*, a trial continuance and reopening discovery) in the Report and Recommendation (“R&R”) (Dkt No. 204), and intend to assert objections to the R&R consistent with the July 1, 2025 Order (Dkt. No. 208) so that their motion for sanctions (and the remedies sought therein) is reviewed *de novo* by the District Court. SPAVI intends to respond to those objections by July 9, 2025 as per the expedited schedule set forth in the July 1, 2025 Order.

1 DATED: July 7, 2025

FOX ROTHSCHILD LLP

2 By: /s/ Michael D. Murphy

3 Michael D. Murphy

4 Matthew Follett

5 Jordan Zollicoffer

6 Attorneys for Plaintiff and Counterclaim

7 Defendant SHAKEY'S

8 PIZZA ASIA VENTURES, INC., and

9 Third-Party Defendants SPAVI

10 INTERNATIONAL, US, INC., CINCO

11 COROPROATION; and PC

12 INTERNATIONAL PTE, LTD.

13 DATED: July 7, 2025

BLANK ROME LLP

14 By: /s/ Todd M. Malynn

15 Todd M. Malynn

16 Arash Beral

17 Jamison T. Gilmore

18 Attorneys for Defendants, Counterclaimants,

19 and Third Party Plaintiffs PCJV USA, LLC,

20 PCI TRADING LLC, POTATO CORNER,

21 LA GROUP, LLC, GK CAPITAL GROUP,

22 LLC, NKM CAPITAL GROUP, LLC and

23 GUY KOREN, and Defendants J & K

24 AMERICANA, LLC, J&K LAKEWOOD,

25 LLC, J&K OAKRIDGE, LLC, J&K

26 VALLEY FAIR, LLC, J & K ONTARIO,

27 LLC, J&K PC TRUCKS, LLC, HLK

28 MILPITAS, LLC, and GK CERRITOS,

LLC

ATTESTATION OF E-FILED SIGNATURE

Pursuant to Civil Local Rule 5-4.3.4(a)(2)(i), I, Todd M. Malynn, hereby attest that I have obtained concurrence in the filing of this document from the other signatories to this document. I declare under penalty of perjury under the laws of United States of America that the foregoing is true and correct.

DATED: July 7, 2025

BLANK ROME LLP

By: *Todd M. Malynn*

Todd M. Malynn

Arash Beral

Jamison T. Gilmore

Attorneys for Defendants, Counterclaimants,
and Third Party Plaintiffs PCJV USA, LLC,
PCI TRADING LLC, POTATO CORNER,
LA GROUP, LLC, GK CAPITAL GROUP,
LLC, NKM CAPITAL GROUP, LLC and
GUY KOREN, and Defendants J & K
AMERICANA, LLC, J&K LAKEWOOD,
LLC, J&K OAKRIDGE, LLC, J&K
VALLEY FAIR, LLC, J & K ONTARIO,
LLC, J&K PC TRUCKS, LLC, HLK
MILPITAS, LLC, and GK CERRITOS,
LLC

CERTIFICATE OF SERVICE

The undersigned certifies that on July 7, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's Electronic Case Filing (ECF) system. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.
Executed on July 7, 2025.

By: /s/AJ Cruickshank